

# Privacy Policy - Contour Design

#### Introduction

When you use Contour Design Nordic A/S' (hereafter "our/we/us") whistleblowing scheme to submit a whistleblowing report about offenses or other serious matters taking place, we may process personal data about you. You can always submit your report anonymously. If you choose to report anonymously, we do not process personal data about you, as our whistleblowing site does not keep a log of the IP address or ID of the device from which you submit the report or access the whistleblowing site. Furthermore, the whistleblowing site does not use cookies. If you wish to submit an anonymous report, we recommend that you do not submit the report via our network, IT equipment, telephones, email accounts or other communication equipment belonging to us.

This privacy policy is only relevant in cases where you choose to disclose your identity in relation to your whistleblowing report. In these situations, we will process your personal data we receive from you when we process the whistleblowing report in question. We are responsible for the personal data we process about you. Our contact details are:

Contour Design Nordic A/S CVR 27651240 Nyropsgade 41-43, Ft Floor. DK -1602 Copenhagen V

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Third-party for suspicions regarding executive management.



Below you can find a description of the personal data we process, the legal basis for processing personal data, disclosure of personal data, the duration of the processing the personal data, your rights in connection with the processing your personal data and, where applicable, information about the transfer of personal data to third countries.

#### Which personal data do we process?

## Whistleblowing report

If you have chosen to disclose your identity when submitting a whistleblowing report, we process ordinary personal data about you in the form of your name, your email address and your telephone number.

The purpose of processing your personal data is to enable further investigation of the matter to which the whistleblowing report relates, to enable our subsequent processing of the case and to ensure documentation of the course of events relating to the whistleblowing report.

The legal basis for processing ordinary personal data is Article 6 (1)(c) of the General Data Protection Regulation (legal obligation), cf. section 9 of the Protection of Whistleblowers Act (Lov om beskyttelse af whistleblowere), and Article 6 (1)(e) of the General Data Protection Regulation (necessary based on public interests).

#### <u>Creating a secure mailbox</u>

You have the option of creating a secure mailbox where you can communicate with us. Regardless of whether you have chosen to submit a report anonymously, or whether you have disclosed your identity when submitting the report, we do not process any personal data about you when using the secure mailbox.

The mailbox is accessed using a case number and a password of your choice. We strongly recommend that your password does not contain personal information, e.g. dates of birth, telephone numbers, etc. If you choose to create a password containing personal data, we will process such personal data in accordance with this privacy policy.

## How long do we store your personal data?

We store your personal data for as long as the processing of the data is considered necessary to fulfill our obligations under the Whistleblower Protection Act (Lov om beskyttelse af whistleblowere) and other relevant special legislation applicable to the whistleblowing report in question. Consequently, we erase your personal data



when we no longer have a reasoned purpose for storing this.

Therefore, we will store your personal data regarding the whistleblowing report for as long as we handle the case relating hereto. Once the case is closed, we will store your personal data for as long as we are obligated to ensure documentation of our handling of the case as well as the outcome of the case.

#### Recipients of the personal data

We may engage data processors in the processing of your personal data. Such data processors include our supplier of the whistleblowing site and our external partner, who assists us with the initial handling of the whistleblowing reports. These two data processors are, as stated in the individual data processor agreements, instructed to only process personal data on our behalf and in accordance with our instructions.

Where possible, we will keep your personal data confidential in relation to any subsequent handling of the reported matter. Consequently, we will only disclose information about your identity in cases where

- the case processing is carried out by an external partner and the information is disclosed to the external partner in question,
- the whistleblowing report results in a police investigation and the information is disclosed to the police,
- the disclosure of information is required by applicable law or
- you provide us with your explicit consent to disclose information about your identity.

#### What rights do you have?

According to the General Data Protection Regulation and the Data Protection Act, you have a number of rights when we process personal data about you. These rights, as well as the opportunity to complain to the Danish Data Protection Agency, are described in detail in this section. If you would like to exercise your rights, you can do so by contacting us via the contact details provided in section 1.

## Right to access personal data (right of access), Article 15

You have the right to request access to the personal data we process about you as well as additional information in connection hereto.



## Right to ratification, Article 16

You have the right to request that inaccurate personal data about you is updated and corrected.

#### Right to erasure, Article 17

You have the right to request erasure of personal data about you before our regular and general erasure takes place.

## Right to restriction of processing, Article 18

You have the right to request that the processing of your personal data is restricted. If you have the right to have the processing of your personal data limited, we may in the future only process this information – with the exception of storage – with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

## Right to transmit personal data (data portability), Article 20

You have the right to request that you receive the personal data we process about you in a structured, commonly used and machine-readable format as well as the right to transmit those data to another data controller without hindrance.

## Right to object, Article 21

If the processing of your personal data is based on public interests, you have the right to object to our otherwise lawful processing of your personal data.

#### Complain to the Danish Data Protection Agency

You have the possibility to complain about our processing of your personal data to the Danish Data Protection Agency via <a href="www.datatilsynet.dk">www.datatilsynet.dk</a> or the Danish Data Protection Agency, Carls Jacobsens Vej 35, 2500 Valby, email <a href="mailto:dt@datatilsynet.dk">dt@datatilsynet.dk</a> and telephone + 45 33 19 32 00.